



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 8 0 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7663 5936
RETURN RECEIPT REQUESTED

Mr. Rick Mark
President
National Recycling, Inc.
15717 Forest Boulevard
Hugo, Minnesota 55038

Re: Notice of Violation
RCRA Compliance Evaluation Inspection – National Recycling, Inc.
EPA I.D.: MND 051 727 592

Dear Mr. Mark:

On November 14, 2012, a representative of the U.S. Environmental Protection Agency inspected the National Recycling, Inc. (NRI) facility, located at 15717 Forest Boulevard, Hugo, Minnesota. The purpose of the inspection was to evaluate NRI's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 *et seq.*, and its implementing regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.

Based on information provided by NRI personnel, a review of records, and personal observations made by the inspector at the time of the investigation, EPA has determined that NRI is in violation of hazardous waste regulations in the Minnesota Administrative Rules (Minn. R.) and in corresponding provisions in the United States Code of Federal Regulations (CFR), as specified below.

Based on the information currently available to us, we find that NRI violated the following requirements:

1. A person, who produces a waste, must evaluate the waste to determine if it is hazardous within sixty (60) days of initially generating the waste. Waste that is not evaluated within sixty (60) days of the generation start date must be managed as a hazardous waste and the person who produces the waste must be considered a generator until the waste is determined to be non-hazardous. *See*, Minn. R. part 7045.0214 Subpart 1 [40 CFR § 262.11].

At the time of the inspection, NRI was storing an unidentified liquid on the pavement, located near a crate that was storing sealed containers that had been removed from

various types of process equipment. NRI failed to determine if this waste was hazardous in violation of the above-mentioned generator requirement.

2. A small quantity handler of universal waste must manage universal waste batteries in a way that prevents releases of any universal waste or component of universal waste to the environment. Any universal waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions must be contained in a container that is closed, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. *See*, Minn. R. part 7045.1400, Subpart 1 [40 CFR § 273.13(a)(1)].

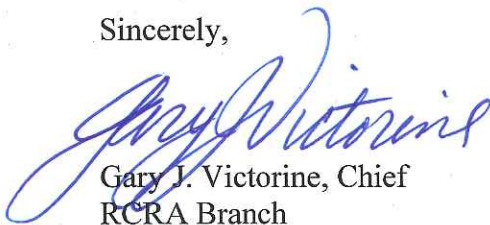
At the time of the inspection, NRI was storing a battery that showed evidence of leakage, which was not being stored in a container that was: 1) closed; 2) structurally sound; 3) compatible with the contents of the battery; and, 4) lacking evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Therefore, NRI failed to properly store universal waste batteries in violation of the above-mentioned generator requirement.

Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violations and requiring compliance immediately or within a specified time period.

Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above requirements. You should submit your response to Jamie L. Paulin, U.S. Environmental Protection Agency, Region 5 (LR-8J), 77 West Jackson Boulevard, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Paulin, of my staff, at (312) 886-1771.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosures

Cc: John Elling, Minnesota Pollution Control Agency (John.Elling@state.mn.us)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 W. JACKSON BOULEVARD

CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: National Recycling, Inc.

EPA ID No.: MND 051 727 592

LOCATION ADDRESS: 15717 Forest Boulevard
Hugo, Minnesota 55038

NAICS CODE(S): 42393 [Recyclable Material Merchant Wholesalers]

DATE OF INSPECTION: November 14, 2012

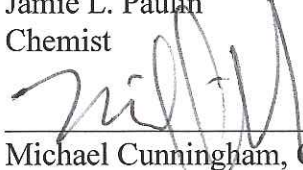
EPA INSPECTOR: Jamie L. Paulin
Chemist
LR-8J
Compliance Section 1
(312) 886-1771 Direct
(312) 353-4788 Facsimile
paulin.jamie@epa.gov

PREPARED BY:


Jamie L. Paulin
Chemist

11/6/13
Date

REVIEWED BY:


Michael Cunningham, Chief
Compliance Section 1
RCRA Branch

01/21/14
Date

INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at the National Recycling, Incorporated (NRI) facility, located at 15717 Forest Boulevard, Hugo, Minnesota, to determine NRI's compliance with the Resource Conservation and Recovery Act (RCRA), including the used oil regulations.

NRI notified as a non-generator in 1997, and had re-notified as a small quantity generator (SQG) on January 12, 2012. They conduct metal recycling and offer scrap metal handling services, including purchasing ferrous metals, non-ferrous metals, precious metals, and other commodities.

NRI generates universal waste, such as fluorescent light bulbs and batteries; used oil; and, possibly flammable hazardous waste. However, NRI personnel stated that they had not generated hazardous waste, or shipped hazardous waste off-site for disposal, from 2009 to the time of the inspection.

They employ about 9 to 38 people between two Minnesota locations. The other facility is located in Cambridge, Minnesota.

OPENING CONFERENCE:

Sheryl Bock, Hazardous Waste Compliance, Minnesota Pollution Control Agency (MPCA), Kathleen Nyquist, Senior Environmental Specialist for Washington County, and Gerard Goder, Environmental Specialist for Washington County, and I entered the NRI facility at 9:10 am on November 14, 2012. I introduced myself, presented my credentials, and described the purpose of my visit.

We met with Mr. Rick Mark, President, and Mr. Ross Ohman, Environmental Contact, from NRI. The personnel that were in attendance at the opening conference are listed in *Table 1*.

I provided a Small Business Resources Information Sheet and the MnTAP Pollution Prevention and Energy Efficiency brochure to Mr. Mark. Mr. Mark did not make a CBI claim on the information gathered during the inspection or on the photos taken, documents copied and/or verbal information provided. Mr. Mark described the process and operations of NRI during the opening conference. We began the physical site inspection immediately following the opening conference.

SITE INSPECTION:

Ms. Mark and Mr. Ohman escorted us on the physical site inspection, which began in the Battery Storage Area, located outside, on the west side of the property. The batteries were being stored on cardboard sheets.

Mr. Mark explained that eventually the batteries are shrink-wrapped and stored on a pallet prior to shipment off-site. However, brown liquid was located under one of the batteries in this area. The brown liquid appeared to be battery leakage. *See*, photographs 1 and 2.

Table 1. Personnel in Attendance during CEI at NRI.

Personnel	Title	Department
Sheryl Bock	Hazardous Waste Compliance	MPCA
Kathleen Nyquist	Senior Environmental Specialist	Washington County
Gerard Goder	Environmental Specialist	Washington County
Rick Mark	President	NRI
Ross Ohman	Environmental Contact	NRI
Jamie Paulin	Chemist	EPA RCRA Branch

We then proceeded to another bin storage area, located outside of the facility, on the west side of the property. NRI was storing PCB light ballasts in a cardboard box. They were also storing sealed containers that had been removed from various types of process equipment in a steel crate. Oil appeared to be leaking at the bottom of the crate from the containers and onto the concrete pad. *See*, photographs 3, 4 and 5.

From the bin storage area, I inspected the shipping dock, located outside on the east side of the property. A box truck was parked in the dock. The truck's back end was positioned toward the dock, the truck doors were open and a ramp was set inside the door for loading and unloading. Icy, muddy rainwater had collected within the dock. *See*, photograph 6.

NRI stores scrap metal in piles throughout the east side and south side of the facility. *See*, photographs 7 and 8.

Lastly, I inspected the inside of the facility on the west side of the building. Two un-used fuel containers were being stored on a shelf in this area. The containers did not contain labels identifying their contents.

I did not observe hazardous waste being stored on-site at the time of the inspection. *See*, photograph 9.

This concluded the site inspection and we continued to Mr. Mark's office where I conducted the Records Review.

RECORDS REVIEW:

Mr. Mark and Mr. Ohman aided me in the review of the hazardous waste records after completing the physical site inspection.

1. Personnel Training

NRI did have a RCRA training program in place, which was performed by Bay West Contractor. The training was conducted annually and the content of the training included: 1) Right-to-Know, 2) Lock Out/Tag Out, 3) Awareness, 4) Containers, 5) NRI Pollution Policy, and 6) Back-up Emergency Plan.

2. Manifests

NRI had not shipped hazardous waste off-site in 2009, 2010, 2011, or 2012. They did provide me with a copy of a Bill of Lading, dated 3/16/12, showing a shipment of one 55-gallon container of a non-regulated heating oil/diesel fuel to WRR Environmental Services, Co. (WRR), located in Eau Claire, WI. *See*, attachment 2 – Bill of Lading to WRR.

3. Waste Analysis and Recordkeeping

I observed that NRI did not have, as a record on-site, a land disposal restriction (LDR) notification form since there were no records of shipments or generation of hazardous waste from 2009 to the date of the inspection.

4. Contingency Plan

An SPCC plan was available for my review during the inspection. NRI does have a storm water permit, number, MNR050000, which expires on 4/5/2015.

5. Preparedness and Prevention

Agreements with local emergency authorities, contractors, or local hospitals were not available for my review during the inspection.

6. Annual Reporting

NRI had not filed an annual report with the Minnesota Pollution Control Agency by March 1 for the last three reporting years. They are currently listed as an SQG within the EPA's RCRAInfo database; however, they have not shipped hazardous waste off-site during this time.

7. Weekly and Daily Inspections

I did not observe hazardous waste being stored in tanks or in containers at the time of the inspection.

CLOSING CONFERENCE:

I conducted the closing conference with Mr. Mark and Mr. Ohman. I explained to them that I would need to review my notes and photographs before making any compliance decisions. I also explained that I would submit a copy of my inspection report along with the photo log to NRI.

We departed NRI around 12:00pm.

ATTACHMENTS: (3)

Attachment 1	Photographs taken during the time of the inspection.
Attachment 2	Bill of Lading showing shipment of fuel to WRR.
Attachment 3	Inspection Checklist.

ATTACHMENT 1

Photographs for National Recycling Inc. MND 051 727 592

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN0495.JPG
Date/Time 11/14/2012
11:59:00 AM
Photographer Jamie Paulin

Description

Battery Storage Area (Outside storage location). The batteries eventually were shrink wrapped and stored on a pallet prior to shipment.



Disk Number 1
Photo Number 2
Photo Filename DSCN0496.JPG
Date/Time 11/14/2012
12:00:00 PM
Photographer Jamie Paulin

Description

Brown liquid located under a battery in the Battery Storage Area. Possible battery leakage.



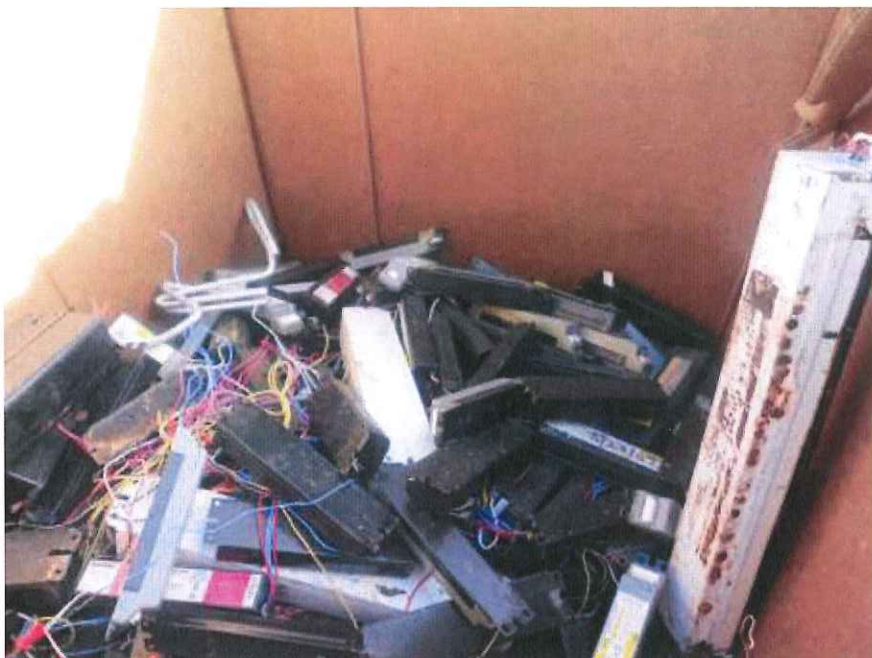
Photographs for National Recycling Inc. MND 051 727 592

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN0497.JPG
Date/Time 11/14/2012
12:03:00 PM
Photographer Jamie Paulin

Description

PCB Light Ballast Storage.



Disk Number 1
Photo Number 4
Photo Filename DSCN0498.JPG
Date/Time 11/14/2012
12:04:00 PM
Photographer Jamie Paulin

Description

Sealed containers from various equipment were being stored in an open bin, located in outside storage area. Oil appeared to be leaking at the bottom of the crate out of the containers onto the concrete pad.



Photographs for National Recycling Inc. MND 051 727 592

Media: RCRA

Disk Number 1
Photo Number 5
Photo Filename DSCN0499.JPG
Date/Time 11/14/2012
12:04:00 PM
Photographer Jamie Paulin

Description

A liquid had collected underneath the crate that was storing sealed containers. It appeared to be oil leaking from the crate.



Disk Number 1
Photo Number 6
Photo Filename DSCN0500.JPG
Date/Time 11/14/2012
12:14:00 PM
Photographer Jamie Paulin

Description

Shipping dock. Icy, muddy rainwater had collected in the dock.



Photographs for National Recycling Inc. MND 051 727 592

Media: RCRA

Disk Number 1
Photo Number 7
Photo Filename DSCN0501.JPG
Date/Time 11/14/2012
12:14:00 PM
Photographer Jamie Paulin

Description

Overview of scrap metal storage located outside on the property facing South.



Disk Number 1
Photo Number 8
Photo Filename DSCN0502.JPG
Date/Time 11/14/2012
12:18:00 PM
Photographer Jamie Paulin

Description

Overview of scrap metal storage located outside on the property facing South.



Photographs for National Recycling Inc. MND 051 727 592

Media: RCRA

Disk Number 1
Photo Number 9
Photo Filename DSCN0503.JPG
Date/Time 11/14/2012
12:22:00 PM
Photographer Jamie Paulin

Description

Two fuel containers were being stored inside of the facility on a shelf.



ATTACHMENT 2

BILL OF LADING



WRR Environmental Services Co., Inc.

5200 Ryder Road, Eau Claire, WI 54701
(715) 834-9624 FAX (715) 836-8785

GENERATOR CLAIMING VERY SMALL QUANTITY

GENERATOR STATUS _____

(SIGNED)

Shippers #

Your P.O. No.

All Information must be typed or printed.

1. Generator's Name and Mailing Address NATIONAL RECYCLING INC 15717 FOREST BLVD EAU CLAIRE, WISCONSIN 54601				A. Profile #			
2. Generator's Phone () 851-407-0002				B. State Generator's ID			
3. Transporter 1 Company Name COMO LUBE & SUPPLIES, INC.		4. US EPA ID Number MIWFO00071529		C. State Transporter's ID 1024114004		D. Transporter's Phone 851-641-1100	
5. Transporter 2 Company Name COMO LUBE & SUPPLIES, INC.		6. US EPA ID Number MIWFO00033597		E. State Transporter's ID 1376073000		F. Transporter's Phone 210-722-0000	
7. Designated Facility Name and Site Address WRR Environmental Services Co., Inc. 5200 Ryder Road Eau Claire, WI 54701		8. US EPA ID Number WID 990 829 475		G. State Facility's ID		H. Facility's Phone 715-834-9624	
9. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group) H.M.				10. Containers No.	11. Total Quantity	12. Unit Wt/Vol	1. Waste No.
a.	NA1503, COMBUSTIBLE LIQUID N.O.S. (HEATING OIL/DIESEL FUEL SOLUTION), COMB LIQ, PGII			1	DM	7	P
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above (3A)2012/0073-1 HESM ERG 128, WASTE				K. Handling Code for Wastes Listed Above			
13. Special Handling Instructions and Additional Information							
14. Emergency Phone# 800-962-0417							
15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources.							
Printed/Typed Name & Position Title Raymond J. Powell				Signature <i>Raymond J. Powell</i>		Date Month Day Year 01/31/16 112	
16. TRANSPORTER 1 Acknowledgement of Receipt of Materials				Signature <i>David S. Stadel</i>		Date Month Day Year 01/31/16 112	
Printed/Typed Name & Position Title DAVID S. STADEL				Signature		Date Month Day Year 1 1 1	
17. TRANSPORTER 2 Acknowledgement of Receipt of Materials				Signature		Date Month Day Year 1 1 1	
Printed/Typed Name & Position Title				Signature		Date Month Day Year 1 1 1	
18. Discrepancy Indication Space							
19. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this document except as noted in Item 18.							
Printed/Typed Name & Position Title William R. Ruchel				Signature <i>William R. Ruchel</i>		Date Month Day Year 01/31/16 112	

1108 Port Terminal Dr
DULUTH, MN 55802
(218) 722-2920
(800) 962-5417
MNR000033597



13575 Fenway Blvd N
HUGO, MN 55038
(651) 646-0830
(800) 254-2705
MNR000078329

Emergency Response
Phone: 800-962-5417

REMIT TO:
PO BOX 16987
DULUTH, MN 55816

Invoice address Acct#: 103429
NATIONAL RECYCLING INC
15717 FOREST BLVD
HUGO, MN 55038

Delivery Location Acct#: 103429
NATIONAL RECYCLING INC
15717 FOREST BLVD
HUGO, MN 55038

Delivery Invoice 524500

Number
Date 3/14/2012
Page 1
Sales order 348559
Purchase Order
Our Account Number
Company Contact RICK
Contact Email
Phone 651-407-0092
Fax
Generator's EPA ID
Note
Delivery Invoice No 258395

Terms: Net 30 days

A 1.33% FINANCE CHARGE WILL BE ADDED
TO ANY INVOICE PAST TERMS FROM DATE
OF SERVICE



HM Item number	Description	Quantity	Unit	Equipment ID	Unit price	Amount
SWPFF	CONTAMINATED DIESEL FUEL/ 55 Gallon Drum Paperwork: BOL Profile# 2012020073-1HE804	1.0000	DRUM	55	150.0000	150.00
MANIFEST	FAC MANIFEST ADMIN FEE The designated facility assesses a handling & filing fee for shipments using the Uniform Hazardous Waste Manifest & Bills of Lading	1.0000	EA		30.0000	30.00

Raymond Zavel 3/16/12
Authorized Signature Date

35

Driver

Sales balance
180.00

Delivery Charge
15.00

Sales tax
1.07

Total
196.07

ATTACHMENT 3

Minnesota Pollution Control Agency

Report Title: Small Quantity Generator (SQG) Compliance Evaluation Inspection Checklist

Preferred ID: *MND 051727* Regulated Party: *National Recycling Inc*

Date: *11/14/12* 592 Inspector: *Samie Paulin*

G4: Licensing / EPA / Permits

Rule	Requirement	Compliance Status	Remarks
7045.0221	Has Regulated Party obtained a generator identification number?	✓	
7045.1020 A	Metro Area - Does the Regulated Party have an approved license?	✓	
7045.0225 1	Outstate - Does the site have a current hazardous waste generator license?	N/A	No
7045.0230 1, B	Outstate - Did the Regulated Party include all hazardous waste streams on its license application?	N/A	
7045.0225 2	Is the Regulated Party's license displayed in a public area at the licensed site?	N/A	
7001.0520 1, A	Does the Regulated Party operate as a TSD without a permit?	N/A	
MS 116.48 1	Are aboveground tanks >500 G registered with the MPCA? Are underground tanks registered with the MPCA?	N/A	

G4: Waste Evaluation

Rule	Requirement	Compliance Status	Remarks
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated?	No	2 areas of leaked material.
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?	N/A	

G4: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0208 1	Is hazardous waste properly disposed of?	N/A	
7045.0208 1, E	Does the Regulated Party comply with the POTW requirements for sewerage hazardous waste?	N/A	
7045.0294 5	Are the required records (training, analytical results, inspection reports, license renewal app, exception reports, manifests) located at the licensed site and available for inspection?	✓	
7045.0568 1	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)	N/A	
7045.0568 3	Has the Regulated Party documented in its operating record the arrangements made with local emergency authorities?	N/A	
7045.0292 5, H,2	Does the Regulated Party have posted at the telephone, the name and phone number of emergency coordinator, the location of fire extinguishers and spill control material, the location of the fire alarm and the telephone number of the fire department?	N/A	
7045.0655 3, A	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction, deterioration, operator error and discharges?	N/A	
7045.0655 3, B	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the Regulated Party follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment?	N/A	
7045.0655 3, E	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?	N/A	

G4: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0845	Does the Regulated Party properly manage used oil?	2.	
7045.0895 4	Has used oil accepted from or given to another business to be burned for energy recovery been tested to determine that it is on-specification?	2.	
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil leaving the generator site for at least three years?	✓	
7045.0805	Does the Regulated Party properly manage used oil-contaminated waste?	2.	
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil-contaminated waste leaving the generator site for at least three years?	✓	
7045.0990	Is the Regulated Party properly managing used oil filters?	N/A	
7045.0990 3, C, 3	Does the Regulated Party keep records of all used oil filters taken off-site by used oil-filter transporters for at least three years?	N/A	

G4: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?	2.	
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to Regulated Party personnel?	✓	

G4: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders?	✓	
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?	✓	
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment) ?	✓	
7045.0566 4	Is emergency equipment tested and maintained?	✓	
7045.0566 5	Does the Regulated Party provide all personnel involved in hazardous waste being poured, mixed, spread, or otherwise handled with immediate access to an internal alarm or emergency communication device?	✓	
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc)?	✓	
7060.0600 2	Has the Regulated Party discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewerage or other means?	2.	
7045.0275 2	If the Regulated Party had a release to the environment did the Regulated Party immediately notify the agency?	2.	
7045.0275 3	If the Regulated Party has had a release, did the Regulated Party recover as rapidly and as thoroughly as possible, any HW that has leaked, spilled, or otherwise escaped a container?	2.	

G4: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0855 2, D	Upon detection of a release of used oil to the environment (not originating from a UST) did the Regulated Party stop the release, contain the released used oil, clean up and manage properly the released used oil and other materials contaminated with used oil, and repair or replace any leaking used oil storage equipment prior to returning it to service to prevent future releases?	2	

G4: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0292 5	Has the Regulated Party accumulated more than 3000 KG (6600 lbs) of hazardous waste?	No	
7045.0292 5, A	Does Regulated Party have hazardous waste that has accumulated for more than 180 days (270 days) of the container accumulation start date?	No	
7045.0292 5, C	Are hazardous waste containers and tanks labeled with their accumulation start date and is it visible for inspection? OR Is start date recorded in a clear and legible log for non-shipping containers or tanks?	N/A	
7045.0292 5, F	Are hazardous waste containers & tanks properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel?	N/A	
7045.0292 5, D	Are hazardous waste storage areas protected from unauthorized access and inadvertent damage from vehicles & equipment?	N/A	
7045.0292 5, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?	N/A	
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?	N/A	

G4: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0626 2, B	Are there suitable leakproof covers for the hazardous waste containers?	N/A	
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?	N/A	
7045.0626 4	Are hazardous waste storage containers closed? Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels?	N/A	
7045.0626 5	Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented?	N/A	
7045.0626 6	Are incompatible wastes adequately separated?	N/A	
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?	N/A	
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?	N/A	
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?	N/A	
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?	N/A	
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?	2.	

G4: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0855 2, C	Are wastes contaminated with used oil stored in containers or tanks that are in good condition, on impermeable surfaces, closed, and labeled "Used Oil" or "Used Oily Waste"?	2.	
7045.0990 3, A	If used oil filters are stored, are they stored in containers that are closed, leakproof and labeled "Used Oil Filters"?	N/A	
273.14 (a)	Are universal waste batteries (each battery), or a battery storage container, labeled with: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"?	✓	
273.13 (a)	Are universal waste batteries (lead acid, NiCad, etc) that show evidence of leakage, spillage, or damage stored in a closed, structurally sound, compatible container?	No	
273.14 (e)	Are containers of universal waste lamps labeled with: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"?	✓	
273.13 (d)	Are universal waste lamps stored in closed containers that are structurally sound, adequate to prevent breakage, and compatible? Do containers lack evidence of leakage, spillage, or damage?	✓	
273.13 (c)	Is mercury containing equipment stored in closed containers that are structurally sound, compatible with the contents of the device? Does the container lack evidence of leakage, spillage, or damage?	2.	
273.14 (d)	Is mercury containing equipment (i.e. each device) or a container in which the equipment is contained labeled with: "Universal Waste - Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury -Containing Equipment"?	2.	

G4: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.02611	Are shipments of hazardous waste made without using a manifest? (exceptions for VSQGs)	N/A	
7045.02617	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)	N/A	
7045.02651, D	Have copies of manifests signed by the generator and transporter been sent to the MPCA within five working days of the initial transporter's acceptance of the waste?	N/A	
7045.02941	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	N/A	
7045.02654, A	Have copies of manifests signed by the facility been sent to the MPCA within 40 days of the acceptance of the waste by the facility?	N/A	
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	N/A	
7045.03021	If Regulated Party exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc)	N/A	

G4: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the Regulated Party sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the Regulated Party's site? Have new notifications been sent when there are changes in waste streams and to any new receiving facilities?	N/A	

G4: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0292 5, H,3	Are employees thoroughly familiar with waste handling and emergency procedures relevant to their job? (within 6 mo of assignment to job) Has employer documented that employee orientation or training of this has been done?	2.	
7045.0292 5, H,1	Is a trained and responsible Emergency Coordinator on-site or on-call?	✓	